

S P O K A N E C O U N T Y



PUBLIC WORKS DEPARTMENT
Dennis M. Scott, P.E., Director

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JUN 6 1990

SUPERFUND BRANCH

Carol Rushin, Chief
Superfund Site Management I
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle WA 98101

RE: HW- 113

June 4, 1990

Dear Ms. Rushin,

Spokane County recognizes the concerns of the EPA and Ecology pertaining to the Domestic Well Monitoring program. The County and its consultant (Bruce Austin) have taken aggressive steps in response to the community concerns.

First I would like to give you the County's perspective of the matter. The Consent Decree outlines the requirements of the program.

1. The domestic well monitoring program is a continuation of the existing program currently being accomplished.

2. The program is carried out under the review of the sampling committee.

3. Changes will not be made without approval of the sampling committee and the County.

4. Any changes to the program will be submitted to Ecology and EPA for review and approval.

This policy is further addressed in a October 26, 1989 letter from Mike Blum, Ecology's former Project Manager (Attch 1.). Mr. Blum states the program provides a "peace of mind" and showed wells still met drinking water standards although showing some level of contamination, and whether the contaminant level was increasing, decreasing or remaining fairly stable. "The secondary purpose of the program was to provide 'scientific data' to be used by us government officials to track the plumes."

This sampling program has been relatively unchanged for several years and has met the needs of the community. Bruce Austin was first hired by Key Tronic Corp. in the early stages of the site



studies. After the Consent Decree was in place, he was placed on contract with Spokane County to continue the existing program as required by the Consent Decree.

(b) [REDACTED] (Chair, Colbert Landfill Contaminant Area Committee) received complaints from residences about the well sampling procedures. (b) (6) [REDACTED] addressed these problems in his letter's to the County. It is unfortunate that this matter was not first brought to the attention of the consultant to allow him to respond to the matter. In any case a County representative visited each homeowner to ascertain the facts of each problem. Two main problems were identified, sampling procedures were questionable and of great concern was the one case of a sample appearing to have been taken where no water was available. The County presented these problems to the consultant for further investigation. The consultant responded with a report (Attch. 2), as a result, the County requested that the field sampler may no longer work with County projects, and that Mr. Austin develop a more detailed field data sheet. Mr. Austin and (b) (6) [REDACTED] gathered well data and prepared field data sheets for each well. These logs allow the sampler to immediately identify the requirements for sampling each well. 7

Although the community still has reservations about the program, they do agree with our solution and will continue to monitor the success. The County is confident in our consultants ability to continue this viable program. A review of past well analysis shows no evidence that the domestic well monitoring program has been compromised.

In response to EPA's and Ecology's requests to resolve QA/QC issues Spokane County offers the following:

1. This program is a carry over of a sampling program that has been in existence for several years, and has not required the same stringent requirements of current Superfund laws. As stated, this program is outside the ongoing remedial investigation and is a public relations effort for the community. Any attempt to upgrade the level of effort provided will greatly escalate the cost of such service, and require a renegotiation of the Consent Decree. At present there is no QA\QC plan, but it is possible to extract information from the existing Landau Quality Assurance Project Plan. An appropriate document can be developed that establishes guidelines for the sampling procedures.

2. An existing 1990 sampling program is included in Attch 3.

3. A schedule to provide a QAPP and SAP will be sent to the agencies within two weeks after receiving agency comments. The County has taken corrective measures to resolve the identified problems in the Domestic Well Monitoring program. The County has discussed the option to restructure the existing Colbert Water

Sampling Committee with the agencies. With the resignation of George Britton and the concerns over the sampling program it seems appropriate to make some changes. The County recommends to install one representative from the County, Ecology, and the Citizens Committee to comprise the committee. In a discussion with Neil Thompson, EPA would not be interested in supplying a representative, but might designate a technical advisor to assist in the first few meetings to establish the goals and responsibilities of the new committee. As this committee is responsible for the oversight of the Domestic Well Monitoring program it provides an opportunity to install new confidence in the program.

If you have any questions concerning this matter please call myself or Dean Fowler.

Sincerely,

for William M. Scott
Dennis M. Scott, P.E., Director
Spokane County Public Works

CC: David Jansen
Ecology